

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BSG RESOURCES (GUINEA) LIMITED, BSG  
RESOURCES (GUINEA) SARL, and BSG  
RESOURCES LIMITED,

Plaintiffs,

v.

GEORGE SOROS, OPEN SOCIETY  
FOUNDATIONS, OPEN SOCIETY  
INSTITUTE, FOUNDATION TO PROMOTE  
OPEN SOCIETY, OPEN SOCIETY  
FOUNDATION, INC., ALLIANCE FOR OPEN  
SOCIETY INTERNATIONAL, INC., OPEN  
SOCIETY POLICY CENTER, and OPEN  
SOCIETY FUND,

Defendants.

No. 1:17-cv-02726 (JFK) (AJP)

**[PROPOSED] ORDER ISSUING A LETTER ROGATORY FOR THE PRODUCTION  
OF DOCUMENTS IN THE BRITISH VIRGIN ISLANDS  
PURSUANT TO THE HAGUE EVIDENCE CONVENTION**

Upon consideration of the application (the “Application”) of Defendants George Soros, Open Society Foundations, Open Society Institute, Foundation to Promote Open Society, Open Society Foundation, Inc., Alliance for Open Society International, Inc., Open Society Policy Center, and Open Society Fund, requesting the issuance of a letter of request (“Letter Rogatory”) pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters, 23 U.S.T. 2555, 847 U.N.T.S. 231 (the “Hague Evidence Convention”) to which both the British Virgin Islands and the United States are parties, 28 U.S.C. § 1781, and Rules 4(f) and 28 of the Federal Rules of Civil Procedure; and upon the record of these civil proceedings; and due and sufficient notice having been given under the circumstances; and it

appearing that no other or further notice need be given; and after due deliberation; and it appearing that good and sufficient cause exists;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:

1. The Application is GRANTED.
2. This Court shall sign the Letter Rogatory attached to the Application as Exhibit B and affix the seal of the United States District Court for the Southern District of New York over said signature in the Letter Rogatory.
3. The Clerk of the Court is directed to return the original, signed Letter Rogatory to Joseph T. Baio of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, so that said documents may be transmitted to the Registrar of the Supreme Court, for the attention of the Supreme Court Registry, No. 84 Main Street, P.O. Box 418, Road Town, Tortola, British Virgin Islands VG1110 (the “Central Authority of the British Virgin Islands”).
4. Joseph T. Baio of Willkie Farr & Gallagher LLP is directed to cause the transmittal of the original, signed Letter Rogatory to the Central Authority of the British Virgin Islands.
5. The Court shall retain jurisdiction over any and all issues arising from or relating to the implementation and interpretation of this order.

Dated: \_\_\_\_\_, 2017  
New York, New York

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THE HONORABLE ANDREW J. PECK  
UNITED STATES MAGISTRATE JUDGE